

March 9, 2012

Kathy Hamel
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Kathy,

Thank you for the opportunity to provide comment in regard to the development of an NPDES permit to allow imazamox to be used to control *Zostera Japonica* on commercially managed shellfish beds. Taylor Shellfish Company supports the development of an NPDES permit for imazamox so it can become part of our IPM program for controlling this invasive noxious weed.

Taylor Shellfish Company has owned and farmed over a thousand acres of tidelands in the Oysterville area of Willapa Bay that was once a very productive manila clam farm. The infestation of the *Zostera Japonica* has caused such an enormous impact to our farm that we can no longer farm this ground. Historically, Taylor Shellfish Company invested hundreds of thousands of dollars in ground enhancement projects, clam seed, and labor costs that improved our farm, increased clam production and provided employment opportunities to citizens in our local communities.

The rapid infestation of *Japonica* has negatively impacted the environment and substrate of our clam farm and tidelands in Willapa Bay. Today, our once productive clam farm is now a wasteland of mud and *Japonica* that produces very few clams and no jobs. An NPDES permit to use imazamox to control *Zostera Japonica* will provide us the tools necessary to salvage our farm, return the substrate and environment to its natural state, and begin the process of farming our ground again.

Sincerely,

Eric R. Hall
Willapa Division Manager
Taylor Shellfish Company